

Jeffrey I. Hasson  
Davenport & Hasson, LLP  
12707 NE. Halsey Street  
Portland, OR 97230  
Phone: (503) 255-5352  
Facsimile No.: (503) 255-6124  
E-Mail: [hasson@dhlaw.biz](mailto:hasson@dhlaw.biz)  
Oregon State Bar No. 872419  
Attorney for Defendant Weltman, Weinberg & Reis Co., LPA, PC

Honorable Patricia Sullivan

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PENDLETON DIVISION

BOB MESCH,

Plaintiff,

vs.

WELTMAN, WEINBERG & REIS CO., LPA,  
PC,

Defendant.

Case No.: 2:13-CV-01695-SU

DEFENDANT WELTMAN, WEINBERG &  
REIS CO., LPA, PC MOTIONS TO DISMISS,  
TO TRANSFER FOR IMPROPER VENUE,  
OR TO TRANSFER VENUE FOR  
CONVENIENCE

[Oral Argument Requested]

**LR 7-1 Certification**

Pursuant to LR 7-1, Defendant Weltman, Weinberg & Reis Co., LPA, PC (“WWR”), prior to filing this Motion, conferred with Plaintiff’s attorney by email, and the parties were unable to reach agreement on WWR’s Motion.

**WWR's Motions**

Pursuant to *FRCP 12 (b) (2)*, WWR moves to dismiss this Action for lack of personal jurisdiction; or WWR moves this Court, pursuant to *FRCP 12 (b) (3)*, to transfer this matter to a proper venue such as the District of Ohio, or the District of Idaho as the District of Oregon is an improper venue. As a further alternative, WWR moves this Court to transfer venue to the District of Idaho for convenience.

DATED: October 30, 2013.

DAVENPORT & HASSON, LLP

s/ Jeffrey I. Hasson

Jeffrey I. Hasson, OSB#872419  
(503) 255-5352  
Attorney for WWR

Certificate of Service

I hereby certify that on October 30, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Joshua Trigsted and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

s/ Jeffrey I. Hasson  
Jeffrey I. Hasson, OSB#872419  
Attorney for WWR  
Davenport & Hasson, LLP  
12707 NE Halsey St.  
Portland, OR 97230  
Phone: (503) 255-5352  
Facsimile: (503) 255-6124